

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Case No. 7:23-cv-897

IN RE:)	
)	
CAMP LEJEUNE WATER LITIGATION)	PLAINTIFF LEADERSHIP GROUP'S
)	NOTICE OF FILING OF SUPERSEDING
This Document Relates To:)	PROPOSED PRETRIAL SCHEDULING
ALL CASES)	ORDER FOR CERTAIN TRACK 1 TRIAL
)	ISSUES
)	

The Plaintiffs' Leadership Group (the "PLG"), hereby gives notice of the filing of its *Superseding Proposed Pretrial Scheduling Order* pursuant to the July 16, 2024 order of Magistrate Judge Robert B. Jones, Jr. In support, PLG shows unto the Court:

(1) On July 12, 2024, the PLG and Defendant filed a joint proposed pretrial order (DE 254) proposing certain deadlines for the completion of expert discovery, dispositive motions practice, and the commencement of trials.

(2) At the July 16, 2024 status conference in this matter, Magistrate Judge Jones directed the parties to "submit another proposal" regarding the pretrial deadlines in the above-captioned cases.

(3) The PLG is committed to the prompt determination of these and all other *Camp Lejeune* cases. Therefore, the PLG submits the attached proposed Scheduling Order that, if entered, allows for the completion of expert discovery, dispositive motions practice, and, critically, the possibility of the commencement of trials in the spring of 2025.

(4) The PLG shared this proposal with Defendant and met and conferred with Defendant prior to this submission. Defendant rejected the PLG's proposal and proposed scheduling deadlines that allow for a later completion of dispositive briefing, and thereby a later

commencement of trials. The PLG believes time is of the essence and therefore rejected DOJ's proposal to prolong deadlines.

(5) The PLG's *Superseding Proposed Pretrial Scheduling Order* is filed contemporaneously herewith.

[Signatures on Following Page]

Respectfully submitted, this 23rd day of July, 2024.

/s/ J. Edward Bell, III

J. Edward Bell, III (admitted *pro hac vice*)
Bell Legal Group, LLC
219 Ridge St.
Georgetown, SC 29440
Telephone: (843) 546-2408
jeb@belllegalgroup.com

Lead Counsel for Plaintiffs

/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser (admitted *pro hac vice*)
Lief Cabraser Heimann & Bernstein, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000
ecabraser@lchb.com

Co-Lead Counsel for Plaintiffs

/s/ Robin L. Greenwald

Robin L. Greenwald (admitted *pro hac vice*)
Weitz & Luxenberg, P.C.
700 Broadway
New York, NY 10003
Telephone: 212-558-5802
rgreenwald@weitzlux.com

Co-Lead Counsel for Plaintiffs

/s/ Mona Lisa Wallace

Mona Lisa Wallace (N.C. Bar No.: 009021)
Wallace & Graham, P.A.
525 North Main Street
Salisbury, North Carolina 28144
Tel: 704-633-5244
mwallace@wallacegraham.com

Co-Lead Counsel for Plaintiffs

/s/ Zina Bash

Zina Bash (admitted *pro hac vice*)
Keller Postman LLC
111 Congress Avenue, Suite 500
Austin, TX 78701
Telephone: 956-345-9462
zina.bash@kellerpostman.com

*Co-Lead Counsel for Plaintiffs and
Government Liaison Counsel*

/s/ W. Michael Dowling

W. Michael Dowling (NC Bar No. 42790)
The Dowling Firm PLLC
Post Office Box 27843
Raleigh, North Carolina 27611
Telephone: (919) 529-3351
mike@dowlingfirm.com

Co-Lead Counsel for Plaintiffs

/s/ James A. Roberts, III

James A. Roberts, III
Lewis & Roberts, PLLC
3700 Glenwood Ave., Ste. 410
Raleigh, NC 27612
Telephone: (919) 981-0191
jar@lewis-roberts.com

Co-Lead Counsel for Plaintiffs